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Our File No.: 0000320977

September 1, 2006

VIA EMAIL & FEDERAL EXPRESS

Bruce P. Beausejour
Alexander Moore
Verizon Massachusetts
185 Franklin Street - 13th Floor
Boston, MA 02110-1585

**Re: D.T.E. 06-61 –
CLEC Coalition's Fourth Set of Data Requests to Verizon MA**

Dear Messrs. Beausejour and Moore:

Enclosed please find Broadview Networks, Inc.; DSCI Corporation; Eureka Telecom, Inc., d/b/a InfoHighway Communications; Metropolitan Telecommunications of Massachusetts, Inc., d/b/a MetTel; New Horizon Communications; and One Communications' (collectively "the CLEC Coalition") Fourth Set of Data Requests to Verizon Massachusetts in connection with the above-referenced matter.

If you have any questions, please contact me.

Sincerely,


Philip J. Macres

cc: D.T.E. 06-61 Service List

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion as)	
to the propriety of the rates and charges set forth in the)	
following tariff: M.D.T.E. No. 14, filed with the)	
Department on June 16, 2006, to become effective)	D.T.E. 06-61
July 16, 2006, by Verizon New England, Inc.)	
d/b/a Verizon-Massachusetts)	

CLEC COALITION'S
FOURTH SET OF DATA REQUESTS TO VERIZON-MASSACHUSETTS

Broadview Networks, Inc.; DSCI Corporation; Eureka Telecom, Inc., d/b/a InfoHighway Communications; Metropolitan Telecommunications of Massachusetts, Inc., d/b/a MetTel; New Horizon Communications; and One Communications (collectively "CLEC Coalition") hereby request that Verizon New England, Inc. d/b/a Verizon-Massachusetts ("Verizon") provide the data, information, and documents described below. Please provide your responses to Philip Macres, Bingham McCutchen LLP, 3000 K Street N.W., Suite 300, Washington, D.C., 20007, within five (5) business days.

DEFINITIONS

1. "Verizon" and "Verizon-Massachusetts" refers to Verizon New England, Inc. d/b/a Verizon-Massachusetts, its subsidiaries, operating companies, affiliates, directors, officers, employees, and agents, unless otherwise indicated.

2. The terms "you" or "your" refer to Verizon and any and all affiliates thereof, including without limitation all former and present officers, attorneys, servants, agents, and representatives of Verizon.

3. "CLEC" refers to any competitive local exchange carrier.

4. The word "similar" is intended to be as comprehensive as possible.

5. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the Requests documents that might otherwise be construed to be outside their scope.

6. "Document" means any written, printed, typed, or visually reproduced material of any kind, whether or not privileged, and includes, but is not limited to, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, computer files, other data compilation, or any other written, recorded, transcribed, taped, filed, or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work, figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge or information.

7. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone

number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

8. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business, and the name of its chief executive officer.

9. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but no longer is in the possession, or subject to the control, of either you or your witnesses, state what disposition was made of such document and explain the circumstances surrounding, and the authorization for, such disposition, and state the date or approximate date thereof.

10. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner, and place of communication, and the topic or subject matter of the communication.

INSTRUCTIONS

A. The terms defined above and the individual Requests should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with applicable law.

B. In these Requests, the singular shall also be treated as plural and vice-versa.

C. These Requests are to be answered by the corporate officers, employees, or agents of Verizon who know the requested information and are authorized to respond on its behalf.

D. In your response to each Request, list the name and title of the person or persons who prepared the response or who is responsible for the information contained therein.

E. The responses should include the name of any witness(es) who will be testifying on behalf of Verizon who will be prepared to answer questions relating to such responses. If, at the time that responses to these Requests are due, it has not been determined whether a witness will be testifying on behalf of Verizon who can answer questions relating to the responses, then provide the name of the Verizon representative most knowledgeable regarding the subject area of and information in each response.

F. If any part of a document is responsive to any Request, the whole document is to be produced.

G. Any alteration of a responsive document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications, and other versions of a final document is a separate and distinct document and **must be produced**.

H. If you are unable to produce a document in response to any Request, so state, and indicate whether the document ever existed, or whether the document once existed but cannot be located. If any document once was, but is no longer in your possession, custody or control, state the whereabouts of any such document when last in your possession, custody or control, state the

date and manner of its disposition and identify its last known custodian. To the extent any documents are lost or destroyed, produce any documents which support your assertion that the document was lost or destroyed, and provide the date thereof.

I. If any Request calls for the production of work papers or related documents relied upon by a witness in conducting his/her studies, include all work papers and other documents which were reviewed by the witness, even if the data, opinion, assumptions or recommendations contained in such documents were not used by the witness in his/her testimony.

J. These Requests are continuing in nature and therefore require you to submit supplemental answers or documents should additional responsive information become known or should documents supplied in response prove to be incorrect or defective.

K. If you object to any part of a Request, answer all parts of Request to which you do not object, and as to each part to which you do object, set forth the specific basis for objection.

L. To the extent you object to the production of any of the documents, please identify each and every document to which any objection to production is asserted by stating in writing a **general description** of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of each such document, and state in writing the nature and basis for each objection for each such document.

M. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a Request contained in a non-written communication, state the following with respect to the non-written communication:

1. The date;
2. The identity of each of the participants in the non-written communication;
3. The identity of each person present during all or any part of the non-written communication;
4. A description of the non-written communication that is sufficient to identify the particular communication without revealing the information for which a privilege or protection from non-disclosure is claimed;
5. The nature of your claim of non-discoverability (e.g., attorney-client privilege); and
6. Each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit the CLEC Coalition to make a full determination as to whether your claim is valid.

N. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a Request contained in a document, set forth with respect to the document:

1. The date and number of pages;
2. The identity of the author(s) or preparer(s);
3. The identity of the addressee, if any;
4. The title;
5. The type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
6. **The subject matter** (without revealing the information as to which privilege or protection from non-disclosure is claimed);
7. The identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
8. The identity of the present custodian(s);
9. The nature of your claim of non-discoverability (e.g., attorney-client privilege); and

10. The facts on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit the CLEC Coalition to make a full determination as to whether your claim is valid.

**CLEC COALITION'S
FOURTH SET OF DATA REQUESTS**

CLEC Coalition 4-1: In FCC Docket Nos. 00-218 and 00-251 (Virginia arbitration), Verizon Virginia removed expenses and revenue associated with Operator Services from its avoided cost discount for CLECs who do not use Verizon Virginia's Operator Services. *See* FCC Doc. Nos. 00-218 & 00-251, Panel Testimony on Unbundled Network Element and Interconnection Costs filed July 31, 2001, pp. 340 and 364 as well as Verizon Massachusetts' response to CLEC Coalition 1-16, Attachment VII, tabs 9 and 10. Please explain why a separate denominator consisting of revenue subject to resale net of operator service revenue was not used to calculate the avoided cost discount for CLECs not using Verizon Massachusetts' Operator Services.

CLEC Coalition 4-2: In FCC Docket Nos. 00-218 and 00-251 (Virginia arbitration), Verizon Virginia asserted that certain indirect expenses are considered avoided because they vary with the level of retail output. *See* FCC Doc. Nos. 00-218 & 00-251, Panel Testimony on Unbundled Network Element and Interconnection Costs filed July 31, 2001, p. 341. Verizon Massachusetts' response to CLEC Coalition 1-16, Attachment VII, tab 4, indicates that Verizon Virginia identified expenses in Accounts 6124 (General Purpose Computers), 6711 (Executive) and 6728 (General & Administrative) as avoided. Yet, Verizon Massachusetts' response to CLEC Coalition 1-7 states that no expenses in the indirect cost accounts are avoided when a Verizon retail customer shifts to resale. Please explain why

Verizon Massachusetts' methodology in this proceeding is different from the one used by Verizon Virginia in the Virginia arbitration?

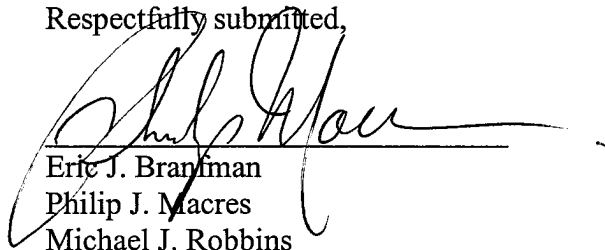
CLEC Coalition 4-3: Verizon Massachusetts' response to CLEC Coalition 1-10 indicates that it primarily relied upon the U.S.O.A. definition in 47 C.F.R Part 32 for individual accounts to ascertain whether an expense was considered avoided or non-avoided with the exception of Accounts 6533 and 6623 where sub-account analysis was used. Yet, Verizon Virginia stated that such main account level data was not used in its avoided cost study because it is too general to make this determination. *See* FCC Doc. Nos. 00-218 & 00-251, Panel Testimony on Unbundled Network Element and Interconnection Costs filed July 31, 2001, p. 341. Please explain why Verizon Massachusetts now believes it is appropriate to use expense data at the U.S.O.A. main account level instead of at the function code level.

CLEC Coalition 4-4: Does Verizon Massachusetts use function codes to categorize expenses within each individual expense account? If Verizon does, please provide all 2005 expenses at the function code level similar to tab 6 within Verizon Massachusetts' response to CLEC Coalition 1-16, Attachment VII.

CLEC Coalition 4-5: In FCC Docket Nos. 00-218 and 00-251 (Virginia arbitration), Verizon Virginia treated all expenses in Account 6612 (Sales) as avoided because they reflected costs incurred performing functions related to selling products and services directly to retail customers. *See* Panel Testimony on Unbundled Network Element and Interconnection Costs filed July 31, 2001, p. 346. Please explain what changes, if any, have

occurred with the accounting methodology used by the Verizon operating companies for expenses recorded in Account 6612 since the filing of the Verizon Virginia avoided cost study in FCC Docket Nos. 00-218 and 00-251.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Philip J. Macres", is written over a horizontal line.

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Date: September 1, 2006

CERTIFICATE OF SERVICE

I certify that on this 1st day of September, 2006, a copy of the CLEC Coalition's Fourth Set of Data Requests to Verizon-Massachusetts in DTE 06-61 was sent to the individuals listed below via postage prepaid first class mail and electronic mail (unless otherwise noted) as follows: (1) overnight mail in lieu of first class mail (if noted with one asterisk); or (2) via electronic mail only (if noted with two asterisks).


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